

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

M.S.G.L., by and through her parents  
GREGORIO GUZMAN REYES and  
MARICRUZ LOPEZ SANTOS, and  
individually,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:22-cv-01554-KKE

ORDER GRANTING STIPULATED  
MOTION FOR EXTENSION OF  
PRETRIAL DEADLINES

**JOINT STIPULATION**

The parties hereby jointly STIPULATE AND AGREE to extend the following deadlines, which were set forth in the Court's October 24, 2024, Order Amending Trial Date and Related Dates (Dkt. 34), as set forth below.

<b><u>Deadline</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
Disclosure of rebuttal expert testimony	March 20, 2025	April 3, 2025
Discovery completed by	April 18, 2025	May 2, 2025

1 A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial  
 2 and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910,  
 3 912 (9th Cir. 1986). The parties have been diligent in completing the discovery in this case,  
 4 including disclosing numerous expert witnesses on February 18, 2025. On February 26, 2025, the  
 5 White House issued an executive order entitled “Implementing the President’s ‘Department of  
 6 Government Efficiency’ Cost Efficiency Initiative.” *See*  
 7 [https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-](https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-cost-efficiency-initiative/)  
 8 [department-of-government-efficiency-cost-efficiency-initiative/](https://www.whitehouse.gov/presidential-actions/2025/02/implementing-the-presidents-department-of-government-efficiency-cost-efficiency-initiative/). Under this Executive Order, the  
 9 United States’ ability to contract for new services, including payments for expert witnesses and  
 10 payments for the cost of taking plaintiffs’ experts’ depositions, was limited for 30 days. The United  
 11 States has worked to find ways to manage existing funds to continue work on the case. However,  
 12 the pause in funding has caused delays in the United States’ ability to pay expert fees and schedule  
 13 depositions, including payments to Plaintiffs’ experts for their deposition time.

14 Recently, this Court denied the parties’ stipulated motion for a one-month continuance of  
 15 the rebuttal expert disclosure, close of discovery, and dispositive motions deadline on the basis  
 16 that the Court requires approximately 120 days between the dispositive motions deadline and trial.  
 17 Dkt. 36. The Court indicated it would consider a subsequent motion that accommodated this  
 18 requirement. *Id.*

19 The parties now request to move the rebuttal expert disclosure deadline and the close of  
 20 discovery deadline only so that the trial date can be maintained. Moving these deadlines will allow  
 21 the United States needed additional time to prepare rebuttal expert reports and to depose Plaintiffs’  
 22 experts. Plaintiffs’ counsel does not condone or concede that the executive order is lawful. In fact,  
 23 Plaintiffs’ counsel believes the executive order is an assault on the judiciary. However, as a  
 24 courtesy to the United States, Plaintiffs have agreed to stipulate to this extension of deadlines.

For the reasons set forth above, the parties believe that there is good cause to request an extension of the above-listed dates and respectfully request that the Court grant their motion.

SO STIPULATED.

DATED this 18th day of March, 2025.

Respectfully submitted,

TEAL LUTHY MILLER  
Acting United States Attorney

GEORGIA TREJO LOCHER, P.S.

s/ Whitney Passmore

WHITNEY PASSMORE, FL No. 91922  
Assistant United States Attorney  
United States Attorney's Office  
Western District of Washington  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4073  
Email: [whitney.passmore@usdoj.gov](mailto:whitney.passmore@usdoj.gov)

s/ Georgia Trejo Locher

GEORGIA TREJO LOCHER, WSBA No. 21450  
237 SW 153rd St.  
Burien, WA 98166  
Phone: 206-246-6100  
Fax: 206-246-6105  
Email: [glocher@thelocherlawfirm.com](mailto:glocher@thelocherlawfirm.com)

*Attorney for Plaintiffs*

*Attorneys for United States of America*

I certify that this memorandum contains 409 words, in compliance with the Local Civil Rules.

**ORDER**

It is hereby ORDERED that the parties' motion is GRANTED. Dkt. No. 37. The new pretrial deadlines are as follows, all other deadlines from the Court's prior case schedule remain unchanged (Dkt. No. 34):

<u><b>Deadlines</b></u>	
Disclosure of rebuttal expert testimony	April 3, 2025
Discovery completed by	May 2, 2025

DATED this 20th day of March, 2025.



\_\_\_\_\_  
Kymberly K. Evanson  
United States District Judge